

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

LEXIE HANDLEY,

Plaintiffs,

v.

**WERNER ENTERPRISES, INC.
and ACE AMERICAN INS. CO.,**

Defendants.

**CIVIL ACTION FILE NO.
7:20-cv-00235-WLS**

**REMOVED FROM SUPERIOR
COURT OF CLINCH COUNTY,
CIVIL ACTION FILE NO.
20CV-116**

**DEFENDANT ACE AMERICAN INS. CO.'S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW, **ACE AMERICAN INS. CO.**, Defendant in the above-styled action (hereinafter "Defendant ACE"), and files this motion for summary judgment, relying on the following:

- A.** Declaration of Vincent Naimoli; and
- B.** Defendant ACE's Brief in Support of its Motion for Summary Judgment.

Respectfully submitted this 28th day of October, 2021.

[SIGNATURE PAGE FOLLOWS]

HALL BOOTH SMITH, P.C.

/s/ Daniell R. Fink

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CERTIFICATE OF SERVICE

I hereby certify that on this day I have served a copy of the within and foregoing **DEFENDANT ACE AMERICAN INS. CO.'S MOTION FOR SUMMARY JUDGMENT** upon all parties to this matter by depositing a true copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows and/or filing said document with the CM/ECF system which will automatically send electronic notification to the following:

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This 28th day of October, 2021.

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